

2:23-cv-03452-JAK-MRW

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In Pro Per

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES

PLAINTIFF

Case No: 2:23-cv-03452-JAK-MRWx

TODD MICHAEL SCHULTZ

vs.

DEFENDANTS

MICHAEL C. THOMPSON
GREGORY R. HOLMES
YOUTUBE LLC

MOTION FOR SANCTIONS ON
DEFENDANTS MICHAEL C.
THOMPSON GREGORY R. HOLMES
AND YOUTUBE FOR MISPRISON,
WITNESS AND PLAINTIFF
INTIMIDATION

Jury Trial Demanded: YES

PLAINTIFF TODD MICHAEL SCHULTZ, in Pro Per, requests that sanctions be placed on both Defendants Michael C. Thompson and Defendant Gregory R. Holmes. The behavior described in the FOURTH AMENDED COMPLAINT (4AC) has continued and highly likely, due to improper intimidation on YouTube's Live Chat, Twitter (currently called "X") and emails from the long time stalker of Plaintiff's

2:23-cv-03452-JAK-MRW

1 boyfriend. A woman, Soledad Haren has commented often on HL Channel (4AC) and
2 has participated in Thompson's Livechat's, to the best of my knowledge. Many very
3 toxic and otherwise harassing emails have come from Ms. Haren. Plaintiff alleges that
4 Mr. Thompson likely played a role in a major amount of all of this conduct. Conduct has
5 included using aliases like "Bret Has HIV" in the LiveChat. Let it be known that relief at
6 the end of this trial must indicate some redress for the functionality that allows for this
7 type of impulsive and anonymous illegal behavior on Youtube, admittedly, the largest
8 platform for User Generated Content. YouTube, let it be put in the record, does not
9 market itself as an "anything goes" type of company. Mr. Thompson knows he is
10 breaking their terms of service. He is responsible for that behavior. YouTube may be
11 responsible as well. Provided that they have provided no voluntary redress for the issue
12 of a functional live chat, they continue to operate with no redress to an issue that I, a
13 victim, stated. Were I not suing YouTube in federal court alongside Holmes and
14 Thompson, they would simply be waiting on the outcome of the trial to decide whether or
15 not Thompson and Holmes' extensive set of illegal activity continues to take place. And
16 they would have to be aware insofar as they were emailed the FIRST AMENDED
17 COMPLAINT upon request. A lack of investigation and firm reason based decision is
18 highly damning, and Plaintiff requests that where appropriate, all defendants be
19 Sanctioned as the court sees fit. Granted, Plaintiff chooses to continue using YouTube,
20 Plaintiff does not harass or participate in illegal or harmful behavior when doing so and
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2:23-cv-03452-JAK-MRW

1 so invokes, if it were at all necessary, his first amendment rights and YouTube's explicit
2 notice to remove if they take issue with me using their platform. It's the only platform I
3 have where I can reasonably reach people and play music for them. Plaintiff requests an
4 injunctive protective order from Michael Thompson and Gregory Holmes, extending to
5 any conspiracy, meaning that they will testify to aforementioned alleged activities they
6 are aware of having taken place since May 5th of 2023. Allegations requiring sanctions:
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- 8 1) Mr. Thompson and Mr. Holmes knew of attempts to harass Plaintiff and
9 supported, participated or executed them as of May 5 2023.
10
- 11 2) Mr. Thompson and Mr. Holmes know of attempts to intimidate Plaintiff via
12 Twitter using handles such as "Judge Dooty" featuring mocking and
13 dangerously close to defamation and otherwise significantly corrupt, especially
14 in the context of being a party to said lawsuit for similar conduct.
15
- 16 3) YouTube LiveChats from users such as "GREG CHAR" and usernames related
17 to Plaintiff's Pro Se status were used to intimidate Plaintiff and prevent him
18 from executing his duties as a Pro Se Litigant.
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- 20 4) Mr. Thompson must answer whether he has ever written or helped to write any
21 of the offensive emails Ms. Haren has sent.
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26 Plaintiff contends that not all speech he finds offensive is harassment. However, in the
27 context of the matter at hand, such conduct is necessary to be lodged with the court as
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2:23-cv-03452-JAK-MRW

1 precisely as possible so that due process for Plaintiff can occur and assure that
2 Defendants themselves are not engaged in activities to disrupt that process, which would
3 be the basis for requested sanctions.
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5 Further, Defendant Youtube should be required to admit or deny that Mr.
6 Thompson's HL Channel, which has since been copyright stricken by myself, after
7 obtaining an 875 dollar copyright of the videos Thompson posted (meaning Plaintiff
8 owned the copyright prior to registration, too, or copyright would not have been granted).
9 They should be sanctioned if after brief questioning, they determine that the channel was
10 in violation of their guidelines and applicable law, then they are proven to have
11 committed misprision throughout this case.
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15 Plaintiff is new to the court system, but comfortable asserting the truth as he sees
16 fit. Plaintiff is always amenable to court instruction provided any mistakes are during use
17 of the court system at his discretion. Rules are rules, and Plaintiff seeks to follow such
18 rules.
19

20 If the court requires that I request specific relief, I will provide for such a request.
21 Plaintiff requests acknowledgement of any of the aforementioned conduct or the
22 misprision of any such conduct, provided the court agrees knowledge of such behavior
23 (intended to prevent Plaintiff's due process) indeed sufficiently violates Federal Code and
24 Rule of Law. Plaintiff provides that it is merely possible Thompson and Holmes are not
25 involved with these activities but very PROBABLE given his knowledge of their
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2:23-cv-03452-JAK-MRW

1 previous conduct. Therefore, Plaintiff finds it fair to lodge and request sanctions if it is
2 found that they are in violation. Plaintiff will lodge the exhibits at the will of the court
3 and stipulation of all parties on naming, but for the sake of this motion, leaves it to the
4 opposing sides to deny all allegations in sufficient detail. Plaintiff has not engaged in this
5 type of activity and can clearly state “No” if asked similar, but reversed claims.
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8 Plaintiff urges the court to determine whether or not the defendants are involved in
9 an intimidation campaign and to sanction them wherever deemed necessary as the
10 harassment is not just hurtful, but harmful to the public discourse and in turn, stimulating
11 intellectual discourse on the internet, which is in the spirit of the internet as regarded in
12 Section 230 A(3) for example.
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16 Dated Wednesday August 2nd, 2023
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18 SIGNATURE of Plaintiff acting in Pro Per
19 Todd Michael Schultz
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